

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 1:22-CV-22671**

DELIO BATISTA,
CARLOS LOPEZ,
MARIANA LOPEZ,
and RAFAELA
VALIENTE,

Plaintiffs,

vs.

AVANT ASSURANCE
INC., REINIER CORTES,
and
ANDREA GONZALEZ QUINTERO,

Defendants.

**DECLARATION UNDER PENALTY OF
PERJURY**

I, REINIER CORTES, being at least 18 years of age, hereby declare based on my personal knowledge:

- I. I am the President at Avant Assurance Inc.
- II. At all times relevant and material to this case, Mariana Lopez was engaged and involved with Avant Assurance Inc solely performing her duties as an independent contractor and before "open enrollment", from November 1st, 2021 – July 11th, 2022. Mariana Lopez requested her individual status as a 1099, agreed to be paid via W-9, and on March 8th, 2022, requested that Avant pay her company Suprani Service LLC.
- III. At all times relevant and material to this case, Carlos Lopez was engaged and involved with Avant Assurance Inc solely performing his duties as an independent contractor from December 8th, 2021 – June 16th, 2022. Carlos Lopez requested his individual status as a 1099, agreed to be paid via W-9, and on May 18th, 2022, requested that Avant pay his company Carlos Eduardo Lopez Alcala PA.
- IV. At all times relevant and material to this case, Rafaela Valiente was engaged and involved with Avant Assurance Inc solely performing her duties as an independent contractor and before "open enrollment", from November 1st, 2020 – June 23rd, 2022. Rafaela Valiente requested her individual status as a 1099, agreed to be paid via W-9, and on March 4th, 2021, requested that Avant pay her company Valiente Insurance LLC.
- V. At all times relevant and material to this case, Delio Batista was engaged and involved

with Avant Assurance Inc solely performing his duties as an independent contractor from September 18th, 2020 – June 20th, 2022. Delio Batista requested his individual status as a 1099 and agreed to be paid via W-9.


I declare under penalty of perjury that the foregoing is true and correct. Executed on May 19th, 2023.



SIGNATURE

STATE OF FLORIDA
COUNTY OF Miami-Dade

The foregoing instrument was acknowledged before me this 19th day of May, 2023, by Jennifer A. Manjarres.


(Seal) Signature of Notary Public
Jennifer A. Manjarres
Produced Identification: ✓
Type of Identification: Florida Driver's License



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished via CMF e-filing portal to attorney for Plaintiffs on May 19th, 2023.

Respectfully submitted,
CUETO LAW GROUP P.L.
Attorneys for Employer/Contractor
4000 Ponce de Leon Blvd.,
Suite 470 Coral Gables, Florida 33146
Tel.: (305) 777-0377
By: Isi Daniel E. Tropp, Esq.
Fla. Bar #948128
Tel.: (direct line) (786) 306-1293
Email: dantropesq@gmail.com

By: Daniel Tropp

DANIEL E. TROPP, ESQ.
Fla. Bar Lic. #94812